

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:		: BK. No. 18-14646-jkf
DEBBIE EDWARDS		:
	Debtor	: Chapter No. 13
		:
		: Hearing Date: December 12, 2018
		:
		: Hearing Time: 9:30 AM

**OBJECTION OF INTERSTATE TD INVESTMENTS, LLC TO THE CONFIRMATION
OF THE DEBTOR'S AMENDED CHAPTER 13 PLAN**

Movant, Interstate TD Investments, LLC (“Movant”), by its attorneys Hill Wallack LLP, hereby objects to the confirmation of the Debtor’s Amended Chapter 13 Plan as follows:

1. Interstate TD Investments, LLC is the holder of a Note and Mortgage on real property owned by Debbie Edwards (“Debtor”) at 2824 Walnut Hill, Philadelphia, PA 19152 (the “Property”).
2. The Mortgage fully matured on September 5, 2008 and all amounts are due and payable.
3. Movant filed an Amended Proof of Claim stating the Debtors’ pre-petition arrearage is approximately \$22,412.69.
4. Debtor filed an Amended Plan November 05, 2018.
5. Debtor’s Amended Plan does not address Movant’s previous Objection filed on October 2, 2018.

6. Debtor's Amended Plan proposes to pay \$21,948.05 to the Movant for pre-petition arrearage on the Mortgage.

7. Additionally, interest continues to accrue on the \$22,412.69 at the contract rate.

8. Debtors fail to provide adequate treatment for Movant's claim.

WHEREFORE, Interstate TD Investments, LLC, Movant, respectfully requests that this Honorable Court deny confirmation of the Debtor's Amended Chapter 13 Plan and enter a bar on any further filings of Chapter 13 by the Debtor.

Respectfully submitted,

/s/Michael J. Shavel, Esquire
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